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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

December 2, 1996

Mr. David Forsythe
Atlantic Division, Code 1822
Naval Facilities Engineering Command
Environmental Quality Division
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Re: Ecological Monitoring Plan
Camp Allen Landfill

Dear Mr. Forsythe:

I am providing comments on the Draft Final Work Plan and Draft Final Sampling and Analysis Plan (SAP) for Post Remediation Ecological Monitoring at Camp Allen Landfill dated August, 1996. This letter includes comments from both EPA and NOAA.

The Post Remediation Monitoring Program was developed to address concerns of the Biological Technical Assistance Group (BTAG). Although we have a few specific suggestions for improving the scope of work, the proposed additional sampling in Bousch Creek should better characterize the extent of contamination in that area and address our comments concerning the area near the Camp Allen Landfill.

The additional surface water and sediment sampling should provide better data in assessing whether contamination from the landfill has migrated along Bousch Creek to Willoughby Bay. However, we still have the concern that the monitoring program does not provide any clear indication of the potential threat to environmental resources within Willoughby Bay since the additional data will still be confined to Bousch Creek with only one sampling location in Willoughby Bay. The potential impacts to biota and supporting habitats (including NOAA trust resources) using Willoughby Bay are at issue.

We recommend that more samples be taken in Willoughby Bay, particularly in the vicinity of the Bousch Creek discharge area. The ecological risk assessment should then be revised to include not only the results of the Bousch Creek sampling, but additional sampling of Willoughby Bay. Based on a screening level risk assessment utilizing only sediment and surface water chemistry

data, decisions will then need to be made regarding additional toxicity sampling. As now proposed in the work plan and SAP, the revised ecological risk assessment would only consider ecological risk to biota in the creek, even though the sampling results could potentially indicate that contamination was carried to the bay.

Specific Comments

Figures 4-1 and 4-2: These figures show sample locations in Bousch Creek at Camp Allen Landfill and the outfall to Willoughby Bay. However, there are a number of other potential sources of contaminants adjacent to Bousch Creek located between Camp Allen Landfill and the outfall. The sampling program would need to be expanded to address the entire watershed and would thereby account for these other potential sources of contamination.

Figure 4-2: This figure indicates there will be one sample location in Willoughby Bay immediately adjacent to the Bousch Creek Culvert Outfall. In order to get a clearer picture of contaminants in Willoughby Bay, at least 6 additional sediment samples should be located in the vicinity of the Bousch Creek Culvert outfall, perhaps spaced on a 50 -100 foot grid network. The sediment should also be collected and analyzed in 2 separate units from each sample location, one from the 0-6 inch fraction and one from the 6-12 inch fraction. These additional sediment samples would help to prevent proving a false negative (indicating that contamination was not there when in fact it was).

Page 4-8: Ponar grabs should also have a rubber flap over the tops to prevent sediment from washing out while the grab is raised.

Also, the samples for VOCs should not be homogenized. The wording on 'Sediment Handling' is unclear on this point.

Page 4-9: The actual detection limits obtained should be reported, and not the CLP contract reporting limits. CLP reporting limits for certain analytes are above the screening guidelines and therefore would provide data of marginal to no use for a risk assessment.

Page 4-10: What CoCs will the matrix spike samples be spiked with? And what protocols will be used to accomplish the spiking?

Page 4-11: How will the impact of CoCs observed above detection limits be evaluated if no Region III screening level exists? Also, how will cumulative impacts due to joint-action toxicity from exposure to multiple compounds be addressed?

Page 4-15: The interpretive ranges for EEQ values should not be used. There is not a linear relationship between exposure and impacts, nor is there greater "risk" once upper thresholds of toxicity have been exceeded. For these reasons, plus several other factors, these interpretive ranges are meaningless. Bioaccumulation for certain compounds (e.g. dioxins, PCBs) may be addressed in more than merely a qualitative fashion: comparisons may be made to known tissue

residue effects levels.

If you have any questions regarding these comments, please contact me or a member of the BTAG.

Sincerely,

Harry Harbold

Harry Harbold
Federal Facilities Branch